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December 29, 2021

Honorable Colleen McMahon
Chief United States District Judge
Southern District of New York
500 Pearl Street
New York, New York 10007

BY ECF

Re: United States v. James Cahill
20 Cr. 521 (CM)

Dear Judge McMahon:

Defendant James Cahill's ("Cahill") is grateful that the Court permitted him to visit with his family over the Christmas holiday. Unfortunately, the recent COVID outbreak kept numerous family members, including some of Cahill's grandchildren, away from gatherings. On New Year's Day, many of the individuals that missed the gatherings along with other family members will be at Cahill's brother's home that is located approximately 500 yards from defendant's home. By this letter, Cahill respectfully requests that he be permitted to walk to his brother's home and attend the gathering from 3:00 pm to 9:00 pm on New Year's Day. Pretrial Services, by United States Pretrial Service Officer Andrew Abbott, does not consent due to their policy on social travel for defendants on home detention. The government, by Assistant United States Attorney Jason Swergold, defers to Pretrial.

Thank you for Your Honor's consideration of this request.

Very truly yours,

Sanford Talkin
Sanford Talkin

cc: AUSA Daniel Sassoon
AUSA Jun Xiang
SAUSA Laura de Oliveira
USPTO Andrew Abbott (by email)

Memo Endorsed

12/29/21

Request Granted

Colleen McMahon